

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 04-10330-JLT
)	
REUBEN LAMONT LACEFIELD,)	
Defendant.)	
)	

JOINT MEMORANDUM FOR FINAL STATUS CONFERENCE

The parties hereby jointly submit this Memorandum for the Final Status Conference pursuant to Local Rule 116.5(C).

The parties hereby report that:

1. The government has provided and made available to the defendant all known discovery.
2. The government does not currently anticipate providing additional discovery but recognizes that its duty is a continuing obligation and it will provide further discovery if and when additional discovery becomes available (as well as that required to be provided just before trial). The government has practiced and will continue to practice open-file discovery in this matter. The defendant has not provided any discovery to the government and also does not anticipate that it will do so, other than that which may be required just prior to trial.
3. The defendant does not intend to raise a defense of insanity or public authority.
4. The government has not requested notice of alibi.
5. ~~At this time, the defendant~~ At this time, the defendant does not anticipate filing any motions requiring a ruling by the

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District Court before trial.

6. The parties believe that resolution short of trial is now likely in this matter, although additional time is needed for the defendant to interact with an expert whom he has retained..
7. The parties hereby agree to the periods already excluded by order of this Court.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

/s/ Paul R. Moore

Paul R. Moore
Assistant U.S. Attorney

Respectfully submitted,

REUBEN LAMONT LACEFIELD
Defendant

By:

/s/ Page Kelley

Page Kelley
Counsel for Mr. Lacefield

DATE: September 1, 2005